

# **EXHIBIT A**

NEW ALLEGATION	LOCATION IN PLAINTIFFS' RESPONSE
"Antitrust enforcers in the United Kingdom and France are currently investigating these Defendants."	Page 1
"Each of the Defendants manages its oral care, personal care and household care products centrally and globally. Henkel and Sara Lee manage these products from their offices in the Netherlands, Unilever from its offices in Germany, and Colgate from its offices in the United States."	Page 1
"Industry price indices for soap and detergents in the United States showed several years of negative or low percentage price increases which suddenly and dramatically reversed in 2006."	Page 1
"[A]fter several years of declining prices, the price of Colgate toothpaste leveled and increased in 2006."	Page 1
"Sara Lee International, headquartered in the Netherlands, manages worldwide all Sara Lee brands regarding household and body care products."	Page 3
"The office of Fair Trading for the United Kingdom has opened an investigation of price fixing and exchange of price information . . . including Colgate toothpaste and various Unilever products."	Page 6
"France's Competition Council is currently investigating nine consumer products makers including Unilever and Colgate-Palmolive."	Page 6
"Colgate has confessed to the French Competition Council about an understanding it had with Procter & Gamble and Unilever."	Page 7
"Colgate reports in its 2007 Annual Report that French, Swiss, German, and Romanian competition authorities were investigating."	Page 7
"Forbes Magazine reported on February 27, 2008 that French antitrust authorities were investigating Henkel."	Page 7
"Bloomberg reported that European Union and Dutch officials had raided Sara Lee and Unilever offices in June."	Page 7
"The price indices for all manufacturers in the United States from 1998 to 2008 for two of the product categories in the market, namely soap . . . and detergents . . . show a clear jump in prices in 2006."	Page 8

NEW ALLEGATION			LOCATION IN PLAINTIFFS' RESPONSE
Soaps			Page 8
Year	PPI	Price Change	
1998	147.3		
1999	147	-0.20%	
2000	145.6	-0.95%	
2001	146.1	0.34%	
2002	146.1	0.00%	
2003	146.2	0.07%	
2004	147.1	0.62%	
2005	150.8	2.52%	
2006	160.8	6.63%	
2007	163	1.37%	
Detergents			Page 9
Year	Annual	Price Change	
1998	105		
1999	104.6	-0.38%	
2000	107.1	2.39%	
2001	109.6	2.33%	
2002	108.1	-1.37%	
2003	109	0.83%	
2004	111.1	1.93%	
2005	111.4	0.27%	
2006	117.5	5.48%	
2007	118.3	0.68%	
“Also in the Oral Care Products group, the price of Colgate brand and Colgate’s Total brand toothpaste reversed a multi-year negative trend in 2006.”			Page 9
Colgate			Page 9
Year	Price	Price Change	
2003	\$2.21		
2004	\$2.05	-7.15%	
2005	\$1.96	-4.67%	
2006	\$1.97	0.88%	
2007	\$1.86	-5.99%	

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<table><tr><th colspan="3">Colgate Total</th></tr><tr><th>Year</th><th>Price</th><th>Price Change</th></tr><tr><td>2003</td><td>\$2.57</td><td></td></tr><tr><td>2004</td><td>\$2.45</td><td>-4.59%</td></tr><tr><td>2005</td><td>\$2.39</td><td>-2.60%</td></tr><tr><td>2006</td><td>\$2.44</td><td>2.19%</td></tr><tr><td>2007</td><td>\$2.47</td><td>1.06%</td></tr></table>	Colgate Total			Year	Price	Price Change	2003	\$2.57		2004	\$2.45	-4.59%	2005	\$2.39	-2.60%	2006	\$2.44	2.19%	2007	\$2.47	1.06%	Page 9																																																																																																																																																									
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<table><tr><th></th><th>2004</th><th>2005</th><th>2006</th><th>2007</th><th>2008</th></tr><tr><td>Household Cleansers</td><td>-1.18%</td><td>1.48%</td><td>4.43%</td><td>1.75%</td><td>0.46%</td></tr><tr><td>ABRASIVE TUB/TILE CLEANER</td><td>3.33%</td><td>2.45%</td><td>5.20%</td><td>3.01%</td><td>-0.42%</td></tr><tr><td>ALL PURPOSE CLEANER/DISINFECTANT</td><td>-0.67%</td><td>1.84%</td><td>3.62%</td><td>0.29%</td><td>-0.33%</td></tr><tr><td>FLOOR CLEANERS/WAXES/WAX REMOVERS</td><td>0.93%</td><td>3.34%</td><td>2.79%</td><td>1.87%</td><td>2.87%</td></tr><tr><td>RUG/UPHOLSTERY CLEANER/DEODORIZER</td><td>1.94%</td><td>2.39%</td><td>3.35%</td><td>3.04%</td><td>-1.41%</td></tr><tr><td>NONABRASIVE TUB/TILE CLEANER</td><td>0.75%</td><td>0.52%</td><td>17.15%</td><td>1.38%</td><td>-1.39%</td></tr><tr><td>GLASS CLEANER/AMMONIA</td><td>-1.18%</td><td>1.67%</td><td>5.21%</td><td>-0.05%</td><td>-0.53%</td></tr><tr><td>TOILET BOWL CLEANER/DEODORIZER</td><td>12.24%</td><td>0.17%</td><td>1.18%</td><td>-2.45%</td><td>-0.45%</td></tr><tr><td>FURNITURE POLISH</td><td>-0.42%</td><td>1.47%</td><td>3.78%</td><td>1.58%</td><td>-0.12%</td></tr><tr><td>Laundry Detergents (not including Softeners)</td><td>-6.36%</td><td>-0.05%</td><td>3.54%</td><td>-3.39%</td><td>1.24%</td></tr><tr><td>LIQUID LAUNDRY DETERGENT</td><td>0.11%</td><td>3.31%</td><td>5.72%</td><td>2.91%</td><td>5.27%</td></tr><tr><td>TABLET LAUNDRY DETERGENT</td><td>19.27%</td><td>2.75%</td><td>8.64%</td><td>17.92%</td><td>15.38%</td></tr><tr><td>POWDER LAUNDRY DETERGENT</td><td>1.30%</td><td>3.92%</td><td>4.12%</td><td>1.68%</td><td>2.16%</td></tr><tr><td>OTHER LAUNDRY DETERGENT (PACKET/BAR)</td><td>-8.58%</td><td>13.01%</td><td>-6.90%</td><td>-2.81%</td><td>12.74%</td></tr><tr><td>Other</td><td></td><td></td><td></td><td></td><td></td></tr><tr><td>FABRIC SOFTENER LIQUID CONCENTRATE</td><td>-0.89%</td><td>0.95%</td><td>4.00%</td><td>4.78%</td><td>4.29%</td></tr><tr><td>FABRIC SOFTENER SHEETS</td><td>1.34%</td><td>1.70%</td><td>3.55%</td><td>3.78%</td><td>1.99%</td></tr><tr><td>DEODORANTS</td><td>1.45%</td><td>2.46%</td><td>3.07%</td><td>5.23%</td><td>3.04%</td></tr><tr><td>DISH DETERGENT</td><td>-2.70%</td><td>1.39%</td><td>7.42%</td><td>1.61%</td><td>0.91%</td></tr><tr><td>DISHWASHER DETERGENT/ADDITIVE</td><td>1.80%</td><td>3.73%</td><td>6.10%</td><td>2.60%</td><td>2.70%</td></tr><tr><td>HAIR CONDITIONER/CREME RINSE</td><td>3.52%</td><td>4.95%</td><td>8.37%</td><td>3.62%</td><td>3.02%</td></tr><tr><td>REGULAR SHAMPOO</td><td>1.86%</td><td>3.42%</td><td>7.30%</td><td>4.35%</td><td>2.18%</td></tr><tr><td>LIQUID BODY WASH/ALL OTHER</td><td>-3.10%</td><td>-2.09%</td><td>2.47%</td><td>3.69%</td><td>1.80%</td></tr><tr><td>MANUAL TOOTHBRUSHES</td><td>0.17%</td><td>0.74%</td><td>4.31%</td><td>7.76%</td><td>0.02%</td></tr><tr><td>MOUTHWASH/DENTAL RINSE</td><td>1.35%</td><td>2.19%</td><td>4.42%</td><td>3.56%</td><td>0.70%</td></tr><tr><td>POWER TOOTHBRUSHES</td><td>-2.03%</td><td>2.97%</td><td>2.83%</td><td>6.04%</td><td>-5.15%</td></tr><tr><td>TOOTHPASTE</td><td>0.49%</td><td>-0.50%</td><td>0.19%</td><td>0.99%</td><td>-0.75%</td></tr><tr><td>DENTAL FLOSS</td><td>-0.92%</td><td>-0.54%</td><td>4.36%</td><td>2.04%</td><td>-0.52%</td></tr></table>		2004	2005	2006	2007	2008	Household Cleansers	-1.18%	1.48%	4.43%	1.75%	0.46%	ABRASIVE TUB/TILE CLEANER	3.33%	2.45%	5.20%	3.01%	-0.42%	ALL PURPOSE CLEANER/DISINFECTANT	-0.67%	1.84%	3.62%	0.29%	-0.33%	FLOOR CLEANERS/WAXES/WAX REMOVERS	0.93%	3.34%	2.79%	1.87%	2.87%	RUG/UPHOLSTERY CLEANER/DEODORIZER	1.94%	2.39%	3.35%	3.04%	-1.41%	NONABRASIVE TUB/TILE CLEANER	0.75%	0.52%	17.15%	1.38%	-1.39%	GLASS CLEANER/AMMONIA	-1.18%	1.67%	5.21%	-0.05%	-0.53%	TOILET BOWL CLEANER/DEODORIZER	12.24%	0.17%	1.18%	-2.45%	-0.45%	FURNITURE POLISH	-0.42%	1.47%	3.78%	1.58%	-0.12%	Laundry Detergents (not including Softeners)	-6.36%	-0.05%	3.54%	-3.39%	1.24%	LIQUID LAUNDRY DETERGENT	0.11%	3.31%	5.72%	2.91%	5.27%	TABLET LAUNDRY DETERGENT	19.27%	2.75%	8.64%	17.92%	15.38%	POWDER LAUNDRY DETERGENT	1.30%	3.92%	4.12%	1.68%	2.16%	OTHER LAUNDRY DETERGENT (PACKET/BAR)	-8.58%	13.01%	-6.90%	-2.81%	12.74%	Other						FABRIC SOFTENER LIQUID CONCENTRATE	-0.89%	0.95%	4.00%	4.78%	4.29%	FABRIC SOFTENER SHEETS	1.34%	1.70%	3.55%	3.78%	1.99%	DEODORANTS	1.45%	2.46%	3.07%	5.23%	3.04%	DISH DETERGENT	-2.70%	1.39%	7.42%	1.61%	0.91%	DISHWASHER DETERGENT/ADDITIVE	1.80%	3.73%	6.10%	2.60%	2.70%	HAIR CONDITIONER/CREME RINSE	3.52%	4.95%	8.37%	3.62%	3.02%	REGULAR SHAMPOO	1.86%	3.42%	7.30%	4.35%	2.18%	LIQUID BODY WASH/ALL OTHER	-3.10%	-2.09%	2.47%	3.69%	1.80%	MANUAL TOOTHBRUSHES	0.17%	0.74%	4.31%	7.76%	0.02%	MOUTHWASH/DENTAL RINSE	1.35%	2.19%	4.42%	3.56%	0.70%	POWER TOOTHBRUSHES	-2.03%	2.97%	2.83%	6.04%	-5.15%	TOOTHPASTE	0.49%	-0.50%	0.19%	0.99%	-0.75%	DENTAL FLOSS	-0.92%	-0.54%	4.36%	2.04%	-0.52%	Page 9-10
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“The global conspiracy has already been exposed in Germany, France and England.”	Page 11
“In France, Colgate confessed to the Competition Council about an agreement (an ‘entente’) among Colgate, Unilever and Proctor & Gamble on ‘personal hygiene products.’”	Page 12
“In England the Office of Fair Trading is engaged in a price fixing investigation involving over 100 household products including Colgate toothpaste and Unilever’s Dove moisturizer.”	Page 12
“Plaintiffs’ factual allegations identify an admitted conspiracy that increased prices commencing in 2006 in Germany, France, England and the United States and for which substantial fines have been imposed in Germany, for which investigations are in process in France and England.”	Page 12
“Indeed, since the filing of the Amended Complaint, Plaintiffs have gathered additional data that the Defendants raised their prices in the United States on products which are the subject of this case during the conspiracy period.”	Page 13
“[A] price fixing agreement made in Europe covered the sale of Defendants’ products in the United States.”	Page 17